

Philip Goodhart (Bar No. 5332)
PNG@thorndal.com
THORNDAL, ARMSTRONG, DELK
BALKENBUSH & EISINGER
1100 E. Bridger Avenue
Las Vegas, NV 89101
Telephone: 702.366.0622
Facsimile: 702.366.0327

Merril Hirsh (*pro hac vice*)
merril@merrilhirsh.com
LAW OFFICE OF MERRIL HIRSH PLLC
2837 Northampton St., NW
Washington, D.C. 20015
Telephone: 202.448.9020

Frederick J. Morgan (*pro hac vice*)
rmorgan@morganverkamp.com
Jennifer M. Verkamp (*pro hac vice*)
jverkamp@morganverkamp.com
Sonya A. Rao (*pro hac vice*)
sonya.rao@morganverkamp.com
MORGAN VERKAMP LLC
35 East Seventh Street, Suite 600
Cincinnati, OH 45202
Telephone: 513.651.4400
Facsimile: 513.651.4405

Attorneys for Plaintiff-Relator Joshua Luke

JAMES J. PISANELLI, ESQ.
Nevada Bar No. 4027
PISANELLI BICE, PLLC
400 South 7th Street, Suite 300
Las Vegas, NV 89101
Telephone: (702) 214-2100
Facsimile: (702) 214-2101
Email: jjp@pisanellibice.com

R. JEFFREY LAYNE, ESQ. (*pro hac vice*)
REED SMITH LLP
111 Congress Avenue, Suite 400
Austin, TX 78701
Telephone: (512) 623-1801
Facsimile: (512) 623-1802
Email: rlayne@reedsmith.com

*Attorneys for Defendants HealthSouth Corp.
And HealthSouth of Henderson, Inc.*

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA, *ex rel.*,
Joshua Luke,

Plaintiff and Relator,

v.

HEALTHSOUTH CORPORATION,
HEALTHSOUTH OF HENDERSON, INC. and
KENNETH BOWMAN,

Defendants.

Case No.: 2:13-cv-01319-APG-VCF

**JOINT STIPULATION TO EXTEND
THE TIME FOR PARTIES TO FILE
PROPOSED SCHEDULING ORDER AND
JOINT OR SEPARATE STATEMENTS
REGARDING RELATOR'S MOTION TO
COMPEL**

(First Request)

1 Plaintiff-Relator Joshua Luke (“Plaintiff”), as relator in this action, and Defendants
2 HealthSouth Corporation and HealthSouth of Henderson, Inc. (collectively, “HealthSouth
3 Defendants”) and Defendant Kenneth Bowman (collectively, “Defendants”), by and through their
4 undersigned counsel, hereby stipulate and agree, subject to this Court’s approval, as follows:

- 5 1. Whereas, a hearing was held in front of Magistrate Ferenbach on February 27, 2019;
6 2. Whereas, after that hearing an order was entered staying the scheduling order and
7 ordering the parties to file a proposed scheduling order and a joint statement regarding the scope of
8 Relator’s discovery, or, to the extent the parties could not reach an agreement pertaining to the scope
9 of discovery, separate statements of their respective positions regarding the same (Dkt. #174);
10 3. Whereas, the Parties are continuing to exchange drafts in an attempt to narrow the
11 issues for the Court, the Parties ask to be given relief from this Court’s entry of the order requiring a
12 proposed schedule and discovery status report(s) until Wednesday, April 3, 2019.

13 This stipulation is made in good faith, is not interposed for delay, and is not filed for an
14 improper purpose. This is the first stipulation to extend the time for the Parties to file a proposed
15 scheduling order and discovery statements.

16 DATED this 27th day of March, 2019.

17 **PISANELLI BICE PLLC**

18 /s/ James Pisanelli
19 JAMES J. PISANELLI, ESQ.
20 Nevada Bar No. 4027
400 S. 7th Street, Suite 300
Las Vegas, NV 89101

21 DATED this 27th day of March, 2018.

22 **REED SMITH LLP**

23 /s/ R. Jeffrey Layne
24 R. JEFFREY LANE, ESQ.
(admitted pro hac vice)
111 Congress Avenue, Suite 400
25 Austin, TX 78701

26 *Attorneys for Defendants HealthSouth Corp.
27 and HealthSouth of Henderson, Inc.*

DATED this 27th day of March, 2019.

**THORNDAL, ARMSTRONG, DELK,
BALKENBUSH & EISINGER**

/s/ Craig Delk
CRAIG R. DELK, ESQ.
Nevada Bar No. 2295
1100 E. Bridger Avenue
Las Vegas, NV 89101

LAW OFFICE OF MERRIL HIRSH

/s/ Merrill Hirsh
MERRIL HIRSH, ESQ.
(admitted pro hac vice)
2837 Northampton St., NW
Washington, D.C. 20015

Attorneys for Relator Joshua Luke

1 DATED this 27th day of March, 2019.

2 **BRADLEY ARANT BOULT**
3 **CUMMINGS LLP**

4 /s/ Elizabeth Hamrick

5 ELIZABETH HAMRICK, ESQ.

6 Nevada Bar No. 9414

7 200 Clinton Avenue West, Suite 900

8 Huntsville, AL 35801

9 *Attorneys for Defendant*
10 *Kenneth Bowman*

DATED this 27th day of March, 2019.

MORGAN VERKAMP LLC

/s/ Frederick M. Morgan, Jr.

FREDERICK M. MORGAN, JR.

(admitted pro hac vice)

SONYA A. RAO

(admitted pro hac vice)

35 East Seventh St., Suite 600

Cincinnati, OH 45202

Attorneys for Relator Joshua Luke



IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

DATED: 3-28-2019

CASE NO.: 2:13-cv-01319-APG-VCF

CERTIFICATE OF SERVICE

I certify that on March 27, 2019, a copy of this document was filed using the Court's CM/ECF system. Copies of this document have been served by electronic means on all registered users of the Court's CM/ECF system who have appeared in this case.

/s/ Kimberly Peets
An employee of Pisanelli Bice PLLC